

Sargent & Lundy ^{LLC}

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Project No. 9583-100

Document No. 50-423

Northeast Nuclear Energy Company
Millstone Nuclear Power Station, Unit No. 3
Independent Corrective Action Verification Program

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

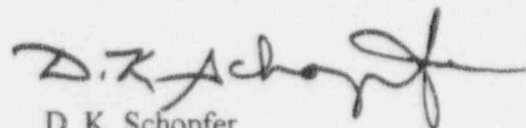
I have enclosed the following two (2) discrepancy reports (DRs) identified during our Programmatic Review activities for the ICAVP. These DRs are being distributed in accordance with the Communications Protocol, PI-MP3-01.

DR No. DR-MP3-0007

DR No. DR-MP3-0008

Please direct any questions to me at (312) 269-6078.

Yours very truly,



D. K. Schopfer
Vice President and ICAVP Manager

DKS:pah
Enclosures
Copies:
E. Imbro (1/1) Deputy Director, ICAVP Oversight
T. Concannon (1/1) Nuclear Energy Advisory Council
J. Fougere (1/1) NU

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PDR ADOCK 05000423
P PDR



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A001/1

Review Group: Programmatic
Review Element: Change Process
Discipline: Other
Discrepancy Type: Design Control Procedure
System/Process: N/A

DR VALID

Potential Operability Issue

Yes

No

Date FAXed to NU:

Date Published:

Discrepancy: Use of Unverified Information

Description: We have reviewed Millstone Station Procedure DC 2, Rev. 1, Change 3 (effective 3/3/97), titled "Developing and Revising Millstone Procedures and Forms". Based on this review, we have noted the following discrepancy.

When, while revising a procedure, reference information is not available, paragraph 1.2.8.b and Attachment 2 of DC 2 require the Procedure Writer to place an empty basis box in the appropriate location (of the procedure) with the following content: "Reference information not currently available." During the procedure verification and validation process, the Independent Reviewer, with the Department Head's concurrence, determines whether the document can be approved without verifying reference information.

Thus, a procedure can be revised with unavailable reference information. There is no review by the PORC/SORC or a subcommittee to evaluate the risk of implementing the procedure with this missing information, and no requirement is imposed to try to recreate the reference material later. This is a discrepancy because unverified information could be used as the basis for a procedure.

| | Valid | Invalid | Review Needed | Date |
|----------------------------|-------------------------------------|--------------------------|--------------------------|--------|
| Initiator: Sheppard, R. P. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 7/7/97 |
| VT Lead: Ryan, Thomas J | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 7/7/97 |
| VT Mgr: Schopfer, Don K | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 7/7/97 |
| IRC Chmn: Singh, Anand K | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 7/7/97 |

Date:

INVALID:

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RESOLUTION:

| | Accept | Reject | Review Needed | Date |
|----------------------------|--------------------------|--------------------------|-------------------------------------|------|
| Initiator: Sheppard, R. P. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| VT Lead: Ryan, Thomas J | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| VT Mgr: Schopfer, Don K | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| IRC Chmn: Singh, Anand K | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |

Date:

REJECTION:

Review Group: Programmatic
 Review Element: Change Process
 Discipline: Other
 Discrepancy Type: Design Control Procedure
 System/Process: N/A

DR VALID

Potential Operability Issue

Yes

No

Date FAXed to NU:

Date Published:

Discrepancy: Procedure Step Sequence

Description: We have reviewed Millstone Station Procedure DC 4, Rev. 3 (effective 1/17/97), titled "Procedural Compliance". Based on this review, we have noted the following discrepancy.

Paragraph 1.4.1 of procedure DC 4 allows, for continuous or general level of use procedures, unless otherwise stated in the procedure, a First Line Supervisor or, in the case of operations procedures, the Shift Manager or Unit Supervisor to authorize deviation from the specified step sequence, as long as the intent of the procedure is neither changed nor compromised. This is not consistent with the standard industry approach for continuous use procedures, especially for operations procedures.

Continuous level of use procedures as defined in Attachment 1 to DC 4 are procedures which "... require step-by-step use to prevent immediate effects on nuclear or personnel safety ...".

The continuous use procedure steps should be performed in the sequence stated in the procedure. See, for example, XVI.C.2.o of INPO Guideline 85-017, Rev. 2, titled "Guidelines for the Conduct of Operations at Nuclear Power Stations", which states in part: "Training on this sequence, reinforced with procedures that show the same sequence, will serve to improve operator performance by development of patterns of action that are more easily remembered. If a procedure step must be performed out of the sequence specified, a procedure change should be completed prior to performing the step unless the procedure specifically states that the step may be performed in any order."

In addition, paragraph 5.2.3 of INPO Preliminary Good Practice OA-106 titled "Technical Procedure Use and Adherence", which is referenced in DC 4, states: "The policy (on procedure use and adherence) provides direction for performing some technical procedures in other than the normal step-by-step manner and identifies conditions requiring procedure changes. For example, procedures that allow limited portions to be performed or the sequence of steps to be changed will include specific instructions on the conditions under which this use is appropriate. Otherwise, procedure changes are required to be initiated and approved prior to performance of the limited portions of the procedure or changing the sequence of steps."

| | Valid | Invalid | Review Needed | Date |
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| VT Lead: Ryan, Thomas J | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 7/7/97 |
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| IRC Chmn: Singh, Anand K | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 7/7/97 |

Date:

INVALID:

ICAVP
Discrepancy Report

Date:

RESOLUTION:

| | Accept | Reject | Review Needed | Date |
|----------------------------|--------------------------|--------------------------|-------------------------------------|------|
| Initiator: Sheppard, R. P. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| VT Lead: Ryan, Thomas J | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
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| IRC Clmn: Singh, Anand K | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |

Date:

REJECTION: